

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	Case No. 23-CR-1020
Plaintiff,)	
)	<u>UNRESISTED</u>
vs.)	MOTION TO CONTINUE
)	SENTENCING HEARING AND
MATTHEW DAVID KEIRANS,)	DEADLINES
)	
Defendant.)	

COMES NOW Defendant, Matthew David Keirans, through counsel, and respectfully moves this Court for an order continuing the sentencing hearing. As grounds in support of this motion, Defendant states as follows:

1. On April 1, 2024, the defendant pled guilty to two counts of a seven-count Indictment (filed December 12, 2023). Count 5 charged False Statement to a National Credit Union Administration Insured Institution, in violation of 18 U.S.C. § 1014; and Count 7 charged Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A(a)(1).

2. A Sentencing hearing is currently set for Friday, October 25, 2024, at 9:00 a.m. (Docket No. 34).

3. The undersigned counsel needs additional time to prepare for the sentencing hearing. The undersigned currently represents approximately 31 other clients in various phases of their federal criminal cases. Most of these clients are detained, causing a great deal of travel for the undersigned to meet with his clients at various county jails.

4. This is the first request for a continuance of the sentencing hearing filed by the defense. The undersigned is requesting a continuance of at least 30-days to mid-November.

5. Assistant United States Attorney Timothy Vavricek has indicated that the government does not resist this motion. He would note that he requests a mid-November date, as December already has multiple scheduled trials with Judge Strand.

THEREFORE, Mr. Matthew David Keirans, through counsel, respectfully moves to for a 30-day continuance of the sentencing hearing and sentencing deadlines, as requested herein.

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CERTIFICATE OF SERVICE
I hereby certify that on October 2, 2024, I electronically filed this document with the Clerk of Court using the ECF system which will serve it on the appropriate parties.

By: /s/ Melissa Dullea